

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE

EMMANUEL CORNET, JUSTINE DE )  
CAIRES, GRAE KINDEL, ALEXIS )  
CAMACHO, JESSICA PAN, EMILY KIM, )  
MIGUEL BARRETO, and BRETT )  
MENZIES FOLKINS, )  
 )  
*Plaintiffs*, ) C.A. No. 23-cv-441-TMH  
v. )  
TWITTER, INC., )  
 )  
*Defendant*. )

**[PROPOSED] ORDER**

The Court, having considered the Motion to Intervene and for Unsealing of Judicial Records of non-parties American Broadcasting Companies, Inc. d/b/a ABC News; the Associated Press; Bloomberg L.P. d/b/a Bloomberg News; Cable News Network, Inc. (“CNN”); Dow Jones & Company, Inc., publisher of *The Wall Street Journal*; Forbes Media; Guardian News & Media Limited; Insider Inc. d/b/a *Business Insider*; NBCUniversal Media, LLC d/b/a NBCUniversal News Group; The New York Times Company; *Wired*, published by Advance Magazine Publishers Inc.; and WP Company LLC d/b/a *The Washington Post* (collectively, the “Press Coalition”), and any responses thereto,

IT IS HEREBY ORDERED this \_\_\_\_\_ day of \_\_\_\_\_, 2025 that:

1. The Press Coalition’s Motion is GRANTED.
2. The Press Coalition shall be permitted to intervene in this proceeding for the limited purposes of challenging the sealing of judicial records, and the following docket entries shall be unsealed in their entirety: D.I. 98 (including attachments), D.I. 108 (including

attachments), D.I. 106 (including attachments), D.I. 111 (including attachments), D.I. 114-2, and D.I. 117-2-8.

3. Plaintiffs shall publicly file the docket entries referenced in the preceding paragraph within two (2) days of this Order.

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The Honorable Todd M. Hughes  
Visiting United States District Judge